

Exhibit A

ALABAMA SJIS CASE DETAIL



County: **61** Case Number: **CV-2021-900021.00** Court Action:
 Style: **MICHAEL J. KULOVITZ V. ASPEN SPECIALTY INSURANCE MGMT, INC.**

PREPARED FOR: LAURA MIMS

Real Time

Case

Case Information

County: **61-TALLADEGA - TALLADEGA** Case Number: **CV-2021-900021.00** Judge: **CEW:CHAD EDWARD WOODRUFF**
 Style: **MICHAEL J. KULOVITZ V. ASPEN SPECIALTY INSURANCE MGMT, INC.**
 Filed: **01/19/2021** Case Status: **ACTIVE** Case Type: **OTHER TORT**
 Trial Type: **JURY** Track: Appellate Case: **0**
 No of Plaintiffs: **1** No of Defendants: **1**

Damages

Damage Amt: **0.00** Punitive Damages: **0.00** General Damages: **0.00**
 No Damages: Compensatory Damages: **0.00**
 Pay To: Payment Frequency: Cost Paid By:

Court Action

Court Action Code: Court Action Desc: Court Action Date:
 Num of Trial days: **0** Num of Liens: **0** Judgment For:
 Disposition Date of Appeal: Disposition Judge: : Disposition Type:
 Revised Judgement Date: Minstral: Appeal Date:
 Date Trial Began but No Verdict (TBNV1):
 Date Trial Began but No Verdict (TBNV2):

Comments

Comment 1:
 Comment 2:

Appeal Information

Appeal Date: Appeal Case Number: Appeal Court:
 Appeal Status: Origin Of Appeal:
 Appeal To: Appeal To Desc: LowerCourt Appeal Date:
 Disposition Date Of Appeal: Disposition Type Of Appeal:

Administrative Information

Transfer to Admin Doc Date: Transfer Reason: Transfer Desc:
 Number of Subpoenas: Last Update: **01/19/2021** Updated By: **AJA**

Parties

Party 1 - Plaintiff INDIVIDUAL - KULOVITZ MICHAEL J.

Party Information

Party: **C001-Plaintiff** Name: **KULOVITZ MICHAEL J.** Type: **I-INDIVIDUAL**
 Index: **D ASPEN SPECIA** Alt Name: Hardship: **No** JID: **CEW**
 Address 1: **609 HILLCREST DRIVE** Phone: **(256) 000-0000**

Address 2:
City: **TALLADEGA** State: **AL** Zip: **35160-0000** Country: **US**
SSN: **XXX-XX-X999** DOB: Sex: **M** Race:

Court Action

Court Action: Court Action Date:
Amount of Judgement: **\$0.00** Court Action For: Exemptions:
Cost Against Party: **\$0.00** Other Cost: **\$0.00** Date Satisfied:
Comment: Arrest Date:
Warrant Action Date: Warrant Action Status: Status Description:

Service Information

Issued: Issued Type: Reissue: Reissue Type:
Return: Return Type: Return: Return Type:
Served: Service Type Service On: Served By:
Answer: Answer Type: Notice of No Service: Notice of No Answer:

Attorneys

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	CAR007		CARPENTER BUFORD CLARK JR	WTCOLL@BELLSOUTH.NET	(256) 362-0081

Party 2 - Defendant BUSINESS - ASPEN SPECIALTY INSURANCE MGMT, INC.

Party Information

Party: **D001-Defendant** Name: **ASPEN SPECIALTY INSURANCE MGMT, INC.** Type: **B-BUSINESS**
Index: **C KULOVITZ MIC** Alt Name: Hardship: **No** JID: **CEW**
Address 1: **C/O GENERAL COUNSEL** Phone: **(256) 000-0000**
Address 2: **175 CAPITOL BLVD.**
City: **ROCKY HILL** State: **CT** Zip: **06067-0000** Country: **US**
SSN: **XXX-XX-X999** DOB: Sex: Race:

Court Action

Court Action: Court Action Date:
Amount of Judgement: **\$0.00** Court Action For: Exemptions:
Cost Against Party: **\$0.00** Other Cost: **\$0.00** Date Satisfied:
Comment: Arrest Date:
Warrant Action Date: Warrant Action Status: Status Description:

Service Information

Issued: **01/19/2021** Issued Type: **F-CERTIFIED MAIL BY FIL** Reissue: Reissue Type:
Return: Return Type: Return: Return Type:
Served: **01/27/2021** Service Type: **C-CERTIFIED MAIL** Service On: Served By:
Answer: Answer Type: Notice of No Service: Notice of No Answer:

Attorneys

Case 1:21-cv-00307-ACA Document 1-1 Filed 02/25/21 Page 4 of 32

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	000000		PRO SE		

Financial**Fee Sheet**

Fee Status	Admin Fee	Fee Code	Payor	Payee	Amount Due	Amount Paid	Balance	Amount Hold	Garnish Party
ACTIVE	N	CONV	C001	000	\$0.00	\$20.40	\$0.00	\$0.00	0
ACTIVE	N	CV05	C001	000	\$340.00	\$340.00	\$0.00	\$0.00	0
ACTIVE	N	JDMD	C001	000	\$100.00	\$100.00	\$0.00	\$0.00	0
ACTIVE	N	LSF3	C001	000	\$25.00	\$25.00	\$0.00	\$0.00	0
ACTIVE	N	VADM	C001	000	\$45.00	\$45.00	\$0.00	\$0.00	0
Total:					\$510.00	\$530.40	-\$20.40	\$0.00	

Financial History

Transaction Date	Description	Disbursement Account	Transaction Batch	Receipt Number	Amount	From Party	To Party	Money Type	Admin Fee	Reason	Attorney	Operator
01/21/2021	CREDIT	CONV	2021038	1546280	\$20.40	C001	000		N			ALS
01/21/2021	RECEIPT	CV05	2021038	1546290	\$340.00	C001	000		N			ALS
01/21/2021	RECEIPT	JDMD	2021038	1546300	\$100.00	C001	000		N			ALS
01/21/2021	RECEIPT	LSF3	2021038	1546310	\$25.00	C001	000		N			ALS
01/21/2021	RECEIPT	VADM	2021038	1546320	\$45.00	C001	000		N			ALS

Case Action Summary

Date:	Time	Code	Comments	Operator
1/19/2021	1:52 PM	FILE	FILED THIS DATE: 01/19/2021 (AV01)	AJA
1/19/2021	1:52 PM	EORD	E-ORDER FLAG SET TO "Y" (AV01)	AJA
1/19/2021	1:52 PM	ASSJ	ASSIGNED TO JUDGE: CHAD E WOODRUFF (AV01)	AJA
1/19/2021	1:52 PM	SCAN	CASE SCANNED STATUS SET TO: N (AV01)	AJA
1/19/2021	1:52 PM	ORIG	ORIGIN: INITIAL FILING (AV01)	AJA
1/19/2021	1:52 PM	TDMJ	JURY TRIAL REQUESTED (AV01)	AJA
1/19/2021	1:52 PM	STAT	CASE ASSIGNED STATUS OF: ACTIVE (AV01)	AJA
1/19/2021	1:52 PM	C001	C001 PARTY ADDED: KULOVITZ MICHAEL J. (AV02)	AJA
1/19/2021	1:52 PM	C001	INDIGENT FLAG SET TO: N (AV02)	AJA
1/19/2021	1:52 PM	C001	LISTED AS ATTORNEY FOR C001: CARPENTER BUFORD CLA	AJA
1/19/2021	1:52 PM	C001	C001 E-ORDER FLAG SET TO "Y" (AV02)	AJA
1/19/2021	1:52 PM	D001	D001 PARTY ADDED: ASPEN SPECIALTY INSURANCE MGMT,	AJA
1/19/2021	1:52 PM	D001	INDIGENT FLAG SET TO: N (AV02)	AJA
1/19/2021	1:52 PM	D001	LISTED AS ATTORNEY FOR D001: PRO SE (AV02)	AJA
1/19/2021	1:52 PM	D001	D001 E-ORDER FLAG SET TO "Y" (AV02)	AJA
1/19/2021	1:52 PM	D001	CERT MAIL-FIL ISSUED: 01/19/2021 TO D001 (AV02)	AJA
1/19/2021	1:55 PM	ECOMP	COMPLAINT E-FILED.	CAR007
2/1/2021	11:52 AM	EMISC	RETURN ON SERVICE - SERVED E-FILED	CAR007
2/1/2021	12:01 PM	D001	SERVICE OF CERTIFIED MAI ON 01/27/2021 FOR D001	ALS

Images

Date:	Doc#	Title	Description	Pages
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Ex. A. State Court Doc Pg. 003

Case 1:21-cv-00307-ACA Document 1-1 Filed 02/25/21 Page 5 of 32

1/19/2021 1:55:09 PM	1	CIVIL COVER SHEET	CIRCUIT COURT - CIVIL CASE	1
1/19/2021 1:55:09 PM	2	COMPLAINT		19
1/19/2021 1:55:52 PM	3	COMPLAINT - TRANSMITTAL	E-NOTICE TRANSMITTALS	2
1/19/2021 1:55:53 PM	4	COMPLAINT - SUMMONS	E-NOTICE TRANSMITTALS	1
2/1/2021 11:52:02 AM	5	RETURN ON SERVICE - SERVED	Return on Service	1
2/1/2021 11:52:08 AM	6	MISCELLANEOUS - TRANSMITTAL	E-NOTICE TRANSMITTALS	3



END OF THE REPORT



State of Alabama Unified Judicial System Form ARCiv-93 Rev. 9/18	COVER SHEET CIRCUIT COURT - CIVIL CASE (Not For Domestic Relations Cases)	Ca: 61 Date of Filing: 01/19/2021 TALLADEGA COUNTY, ALABAMA BRIAN YORK, CLERK Judge Code:
GENERAL INFORMATION		
IN THE CIRCUIT COURT OF TALLADEGA COUNTY, ALABAMA MICHAEL J. KULOVITZ v. ASPEN SPECIALTY INSURANCE MGMT, INC.		
First Plaintiff: <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other		
First Defendant: <input checked="" type="checkbox"/> Business <input type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other		
NATURE OF SUIT: Select primary cause of action, by checking box (check only one) that best characterizes your action:		
TORTS: PERSONAL INJURY <input type="checkbox"/> WDEA - Wrongful Death <input type="checkbox"/> TONG - Negligence: General <input type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input checked="" type="checkbox"/> TOXX - Other: _____	OTHER CIVIL FILINGS (cont'd) <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/ Enforcement of Agency Subpoena/Petition to Preserve <input type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/ Injunction Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORJ - Foreign Judgment <input type="checkbox"/> FORF - Fruits of Crime Forfeiture <input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> PFAB - Protection From Abuse <input type="checkbox"/> EPFA - Elder Protection From Abuse <input type="checkbox"/> FELA - Railroad/Seaman (FELA) <input type="checkbox"/> RPRO - Real Property <input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> COMP - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case	
TORTS: PERSONAL INJURY <input type="checkbox"/> TOPE - Personal Property <input type="checkbox"/> TORE - Real Property	OTHER CIVIL FILINGS <input type="checkbox"/> ABAN - Abandoned Automobile <input type="checkbox"/> ACCT - Account & Nonmortgage <input type="checkbox"/> APAA - Administrative Agency Appeal <input type="checkbox"/> ADPA - Administrative Procedure Act <input type="checkbox"/> ANPS - Adults in Need of Protective Services	
ORIGIN: F <input checked="" type="checkbox"/> INITIAL FILING R <input type="checkbox"/> REMANDED A <input type="checkbox"/> APPEAL FROM DISTRICT COURT T <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT O <input type="checkbox"/> OTHER		
HAS JURY TRIAL BEEN DEMANDED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P, for procedure)		
RELIEF REQUESTED: <input checked="" type="checkbox"/> MONETARY AWARD REQUESTED <input type="checkbox"/> NO MONETARY AWARD REQUESTED		
ATTORNEY CODE: CAR007 1/19/2021 1:55:28 PM Date /s/ B CLARK CARPENTER Signature of Attorney/Party filing this form		
MEDIATION REQUESTED: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNDECIDED		
Election to Proceed under the Alabama Rules for Expedited Civil Actions: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

ELECTRONICALLY FILED
1/19/2021 1:55 PM
61-CV-2021-90021.00
CIRCUIT COURT OF
TALLADEGA COUNTY, ALABAMA
BRIAN YORK, CLERK

IN THE CIRCUIT COURT OF TALLADEGA COUNTY, ALABAMA

MICHAEL J. KULOVITZ,

Plaintiff,

CASE NO.: CV-

Aspen Specialty Insurance Company,
and ABC; ABC being those persons, firms,
corporations, or entities issuing to Michael J.
Kulovitz that certain professional liability
insurance policy made the subject of the
complaint in this case, being policy number
ES10274-01, whose names are otherwise
unknown, but whose name will be added by
amendment when ascertained,

Defendants.

COMPLAINT

COUNT 1: BREACH OF CONTRACT

1.) At a point prior to August 19, 2019, Aspen Specialty Insurance Company (hereinafter “Aspen”) and ABC issued a policy of professional liability insurance bearing policy number ES10274-01 to Michael J. Kulovitz, in which Aspen and ABC agreed to defend and indemnify Michael J. Kulovitz regarding any sums he became legally obligated to pay as damages in circumstances as alleged (but untrue) by the plaintiff in the original and amended complaints of Angela Barclay Hunter (hereinafter “Hunter”) in Civil Action Number CV-2019-900480, presently pending in the Circuit Court of Talladega County, Alabama, copies of which are attached hereto as Exhibit A as if fully and completely set out herein.

2.) On or about October 17, 2019, and October 23, 2019, Michael J. Kulovitz notified Aspen and ABC in writing of Hunter's claim and requested Aspen and ABC to provide a defense and indemnity to him for that claim.

3.) On or about November 12, 2019, Aspen and ABC refused to defend or indemnify Michael J. Kulovitz and advised that Aspen and ABC would not be taking any action in connection with the Hunter lawsuit by and through the agent of Aspen and ABC, Ronald L. Kamer. Subsequent correspondence on behalf of Michael J. Kulovitz seeking reconsideration by Aspen and ABC of the decision resulted only in a final notice from their agent, Mr. Kammer, that the original denial of coverage would stand by email of November 5, 2020.

4.) The refusal by Aspen and ABC to indemnify and defend Michael J. Kulovitz in the action by Hunter is a breach of the insurance contract referenced here

COUNT 2: BAD FAITH

5.) The plaintiff, Michael J Kulovitz, re-alleges the matters contained in paragraphs 1 through 4.

6.) The refusal of Aspen and ABC to indemnify and defend Michael J. Kulovitz with regard to the Hunter litigation was without a legitimate or arguable basis, and as such, Aspen and ABC are guilty of "normal" bad faith.

7.) In addition or in the alternative, Aspen and ABC's refusal to indemnify and defend Michael J. Kulovitz was accompanied by an intentional or reckless failure to properly subject the claim to a cognitive evaluation or review, with a manufactured debatable reason to deny the claim and/or based upon reliance on an ambiguous portion of the policy. As such, Aspen and ABC are guilty of "abnormal" bad faith.

PROXIMATE CAUSE & DAMAGES

As a proximate result of the breach of contract and bad faith of Aspen and ABC, Plaintiff Michael J. Kulovitz, has and will suffer financial loss in the form of attorney's fees, claim expenses, loss of time, and other economic losses, as well as the amount of any judgment rendered in the unlikely event of a judgment in favor of Hunter in the underlying action, as well as mental and emotional distress.

WHEREFORE, subject to his deductible, Michael J. Kulovitz claims of Aspen and ABC indemnification for any judgment rendered against him in favor of Hunter with regard to the claims of Hunter, and compensatory damages for attorney's fees for the defense of the underlying action, claims expenses, loss of time, other economic and financial losses, and for his mental and emotional distress occasioned by Aspen's and ABC's refusal to indemnify and defend.

THIS PLAINTIFF DEMANDS A TRIAL BY STRUCK JURY ON ALL ISSUES PRESENTED IN THIS CAUSE.

Respectfully Submitted,

/s/ B. Clark Carpenter, Jr.

B. CLARK CARPENTER, JR. (CAR007)

Attorney for Plaintiff Michael J. Kulovitz

OF COUNSEL:
THORNTON, CARPENTER,
O'BRIEN, LAWRENCE & SIMS
Post Office Drawer 277
Talladega, Alabama 35161
(256) 362-0081

CERTIFICATE OF SERVICE

The Clerk of this Court is requested to serve Defendant Aspen Specialty Insurance Management Inc. by certified mail at:

Aspen Specialty Insurance Management Inc.
c/o General Counsel
175 Capitol Blvd.
Rocky Hill, CT 06067

/s/ B. Clark Carpenter, Jr.

OF COUNSEL

DOCUMENT 2



ELECTRONICALLY FILED
6/18/2020 3:44 PM
61-CV-2019-900480.00
CIRCUIT COURT OF
TALLADEGA COUNTY, ALABAMA
BRIAN YORK, CLERK

IN THE CIRCUIT COURT FOR TALLADEGA COUNTY, ALABAMA

ANGELA BARCLAY HUNTER,

Plaintiffs,

vs.

MICHAEL J. KULOVITZ,

Defendant.

§
§
§
§
§
§
§

CASE NO. : CV-2019-900480.00

FIRST AMENDED COMPLAINT

Comes now the Plaintiff and amends her complaint to provide specificity to her fraud count and restate her remaining claims as follows:

1. Plaintiff, Angela Barclay Hunter is a resident of Talladega County, Alabama.
2. Defendant Michael J. Kulovitz is a resident of Talladega County, Alabama and operated a dental office at 108 North Street East, Talladega, Alabama, 35161.
3. On about April and May, 2016, Plaintiff underwent extensive dental work at Defendant's office. By October 13, 2016, Plaintiff owed Defendant \$1,699.00.
4. At that time, Defendant agreed to accept payments on the balance due but wanted a check from Plaintiff for the full amount to be held as some kind of security. Plaintiff's husband, Trenton Hunter authorized Plaintiff to issue a check in the amount of \$1,699.00 to be held by Defendant while payments were made. Plaintiff's check was dated 10-13-16.
5. Thereafter, Plaintiff made payments and her insurance made payments and by August 2017, the balance due was \$598.55.
6. With insurance payments being made, Plaintiff waited on updated statements from Defendant and Defendant did not send any balance due bills after March 2018.
7. On about October 19, 2018, the Defendant, knowing that the amount due was \$598.55 and that even that amount was not certain, attempted to cash the old check (\$1,699.00). Because the check was two years old, the bank would not accept it. So, Defendant altered the date on the check to reflect the year 2018. Thus, the new forged date on the check was 10-13-18.
8. The two year old check was returned for insufficient funds. Thereafter, Defendant filed charges against Plaintiff for "Negotiating a Worthless Instrument" in Talladega County District Court. These were false charges based on a altered instrument forged by Defendant and claiming an amount greater than the amount owed. Defendant's actions were contumely and malicious.

EXHIBIT

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9. On about May 4, 2019, Plaintiff was stopped while driving. Plaintiff was informed by the Talladega Sheriff Deputy that there was a warrant for her arrest. Plaintiff was arrested; her car was towed to an impound lot, Plaintiff was booked and incarcerated. Plaintiff was required to post an appearance bond; and her case was set for trial in June 2019. Plaintiff hired a lawyer to defend her.

10. Plaintiff and her attorney attended a trial setting on said charge and explained to the District Attorney that the check was two years old and altered; that the balance due was far less than the amount of the check; and the check was never intended to be used to pay for a balance that was ever decreasing.

11. On about July 3, 2019, the charges against Plaintiff were dismissed.

COUNT ONE

12. Plaintiff adopts and incorporates by reference all allegations set forth above.

13. Defendant is guilty of malicious prosecution and abuse of process. As a proximate cause of Defendant's wrongful acts, Plaintiff Angela Barclay Hunter has suffered emotional distress, embarrassment, inconvenience, incarceration, loss of time, and financial damages.

COUNT TWO

14. Plaintiff adopts and incorporates by reference all allegations set forth above.

15. Defendants are guilty of negligence and wantonness. As a proximate cause of Defendant's wrongful acts, Plaintiff Angela Barclay Hunter has suffered emotional distress, embarrassment, inconvenience, incarceration, loss of time, and financial damages.

COUNT THREE

16. Plaintiff adopts and incorporates by reference all allegations set forth above.

17. Defendant is guilty of fraud. Between 2016 and October 2018, Plaintiff had paid Defendant substantial amounts of money directly and through dental insurance. In mid-2018, Plaintiff was not sure of the balance due and Defendant had not sent a statement in months. The actual balance due was less than \$700. On about October 19, 2018, Defendant altered Plaintiff's two year old check in the amount of \$1,699.00 so that it appeared to have been written on 10-13-18. Defendant then placed this check into its bank (First Bank of Alabama) for deposit, thereby representing to Plaintiff's bank, America's First Federal Credit Union (agent) that 1.) this check was written by Plaintiff less than a week prior, and 2.) Plaintiff owed Defendant this amount less than a week prior. After the check was returned for insufficient funds, Defendant misrepresented to the Talladega Sheriff's Department (a governmental entity for the citizens of Talladega County, including Plaintiff) that this check was recently presented by Plaintiffs for a current debt. These representations made by Defendant to Plaintiff's bank and county law enforcement were false and Defendant knew they were false. As a proximate cause of Defendant's wrongful acts,

Plaintiff Angela Barclay Hunter was arrested and incarcerated as stated above and has suffered emotional distress, embarrassment, inconvenience, incarceration, loss of time, and financial damages.

COUNT FOUR

18. Plaintiff adopts and incorporates by reference all allegations set forth above.
19. Defendant is guilty of deceptive trade practices. As a proximate cause of Defendant's wrongful acts, Plaintiff Angela Barclay Hunter has suffered emotional distress, embarrassment, inconvenience, incarceration, loss of time, and financial damages.

WHEREFORE, Plaintiff demands judgement against Defendants in the amount to be determined by a jury for compensatory and punitive damages, attorney fees and court costs.

/s/ **KearneyDeeHutsler**

KEARNEY DEE HUTSLER
Attorney for Plaintiff
15 Richard Arrington Blvd. N., #320
Birmingham Alabama 35223
(205) 414-9979 Fax (205) 879-9229

PLAINTIFF DEMANDS TRIAL BY JURY.

/s/ Kearney Dee Hutsler

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of June, 2020, I have forwarded a true and correct copy of the foregoing via ☒ electronic delivery, or first-class mail or ☐ overnight delivery, to the following:

Clark Carpenter, Esq.
P.O. Box 277
Talladega, AL 35161-0277

/s/ Kearney Dee Hutsler



ELECTRONICALLY FILED
9/16/2019 2:35 PM
61-CV-2019-900480.00
CIRCUIT COURT OF
TALLADEGA COUNTY, ALABAMA
BRIAN YORK, CLERK

IN THE CIRCUIT COURT FOR TALLADEGA COUNTY, ALABAMA

ANGELA BARCLAY HUNTER,	§	
	§	
Plaintiffs,	§	
vs.	§	CASE NO. :
MICHAEL J. KULOVITZ,	§	
	§	
Defendant.	§	

COMPLAINT

Comes now the Plaintiff and states that:

1. Plaintiff, Angela Barclay Hunter is a resident of Talladega County, Alabama.
2. Defendant Michael J. Kulovitz is a resident of Talladega County, Alabama and operated a dental office at 108 North Street East, Talladega, Alabama, 35161.
3. On about April and May, 2016, Plaintiff underwent extensive dental work at Defendant's office. By October 13, 2016, Plaintiff owed Defendant \$1,699.00.
4. At that time, Defendant agreed to accept payments on the balance due but wanted a check from Plaintiff for the full amount to be held as some kind of security. Plaintiff's husband, Trenton Hunter authorized Plaintiff to issue a check in the amount of \$1,699.00 to be held by Defendant while payments were made. Plaintiff's check was dated 10-13-16.
5. Thereafter, Plaintiff made payments and her insurance made payments and by August 2017, the balance due was \$598.55.
6. With insurance payments being made, Plaintiff waited on updated statements from Defendant and Defendant did not send any balance due bills after March 2018.
7. On about October 19, 2018, the Defendant, knowing that the amount due was \$598.55 and that even that amount was not certain, attempted to cash the old check (\$1,699.00). Because the check was two years old, the bank would not accept it. So, Defendant altered the date on the check to reflect the year 2018. Thus, the new forged date on the check was 10-13-18.
8. The two year old check was returned for insufficient funds. Thereafter, Defendant filed charges against Plaintiff for "Negotiating a Worthless Instrument" in Talladega County District Court. These were false charges based on a altered instrument forged by Defendant and claiming an amount greater than the amount owed. Defendant's actions were contumely and malicious.

EXHIBIT

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9. On about May 4, 2019, Plaintiff was stopped while driving. Plaintiff was informed by the Talladega Sheriff Deputy that there was a warrant for her arrest. Plaintiff was arrested; her car was towed to an impound lot, Plaintiff was booked and incarcerated. Plaintiff was required to post an appearance bond; and her case was set for trial in June 2019. Plaintiff hired a lawyer to defend her.

10. Plaintiff and her attorney attended a trial setting on said charge and explained to the District Attorney that the check was two years old and altered; that the balance due was far less than the amount of the check; and the check was never intended to be used to pay for a balance that was ever decreasing.

11. On about July 3, 2019, the charges against Plaintiff were dismissed.

COUNT ONE

12. Plaintiff adopts and incorporates by reference all allegations set forth above.

13. Defendant is guilty of malicious prosecution and abuse of process. As a proximate cause of Defendant's wrongful acts, Plaintiff Angela Barclay Hunter has suffered emotional distress, embarrassment, inconvenience, incarceration, loss of time, and financial damages.

COUNT TWO

14. Plaintiff adopts and incorporates by reference all allegations set forth above.

15. Defendants are guilty of negligence and wantonness. As a proximate cause of Defendant's wrongful acts, Plaintiff Angela Barclay Hunter has suffered emotional distress, embarrassment, inconvenience, incarceration, loss of time, and financial damages.

COUNT THREE

16. Plaintiff adopts and incorporates by reference all allegations set forth above.

17. Defendant is guilty of fraud. Defendant altered Plaintiff's document to misrepresent the nature of the facts to the bank and law enforcement thereby causing harm to Plaintiff. As a proximate cause of Defendant's wrongful acts, Plaintiff Angela Barclay Hunter has suffered emotional distress, embarrassment, inconvenience, incarceration, loss of time, and financial damages.

COUNT FOUR

18. Plaintiff adopts and incorporates by reference all allegations set forth above.

19. Defendant is guilty of deceptive trade practices. As a proximate cause of Defendant's wrongful acts, Plaintiff Angela Barclay Hunter has suffered emotional distress, embarrassment, inconvenience, incarceration, loss of time, and financial damages.

WHEREFORE, Plaintiff demands judgement against Defendants in the amount to be determined by a jury for compensatory and punitive damages, attorney fees and court costs.

/s/ **KearneyDeeHutsler**

KEARNEY DEE HUTSLER

Attorney for Plaintiff

15 Richard Arrington Blvd. N., #320

Birmingham Alabama 35223

(205) 414-9979 Fax (205) 879-9229

PLAINTIFF DEMANDS TRIAL BY JURY.

/s/ Kearney Dee Hutsler

Please serve the Defendant at the following address:

Michael J. Kulovitz
108 North Street East
Talladega, AL 35161

IN THE CIRCUIT COURT FOR TALLADEGA COUNTY, ALABAMA

ANGELA BARCLAY HUNTER,

Plaintiffs,

vs.

MICHAEL J. KULOVITZ,

Defendant.

§
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§

CASE NO. :

PLAINTIFF'S INTERROGATORIES AND REQUEST FOR PRODUCTION

Comes now the Plaintiff and propounds the following interrogatories and request for production to Defendant Michael J. Kulovitz:

1. Please produce a copy of you malpractice insurance policy.
2. Please produce a copy of any other insurance covering your negligent acts.
3. Please state the full names, office title and address of each person having anything to do with the altered check and charges brought against Plaintiff. Please state in detail what each person did. Also explain what the bank (which one?) said about a 2 year old check.
4. Have you been paid in full for all dental work done for Plaintiff? If not, how much is owed?
5. Please produce any photographs or video of the Plaintiffs.
6. Describe the purpose for requiring Plaintiff to write a check for \$1,699.00 on October 13, 2016.

/s/ Kearney Dee Hutsler

KEARNEY DEE HUTSLER

Attorney for Plaintiff

15 Richard Arrington Blvd. N., Ste. 320

Birmingham Alabama 35203

(205) 414-9979

879-9229 fax

Please serve the Defendant with this discovery at the following address:

Michael J. Kulovitz
108 North Street East
Talladega, AL 35161

IN THE CIRCUIT COURT OF TALLADEGA COUNTY, ALABAMA

MICHAEL J. KULOVITZ,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO.: CV-
)	
Aspen Specialty Insurance Company,)	
and ABC; ABC being those persons, firms,)	
corporations, or entities issuing to Michael J.))	
Kulovitz that certain professional liability)	
insurance policy made the subject of the)	
case being policy number ES10274-01,)	
whose names are otherwise unknown, but)	
whose name will be added by)	
amendment when ascertained,)	
)	
Defendant.)	

**PLAINTIFF'S FIRST INTERROGATORIES TO DEFENDANT ASPEN SPECIALTY
INSURANCE COMPANY**

COMES NOW Plaintiff Michael Kulovitz and desiring the testimony of Defendant Aspen Specialty Insurance Company (hereinafter "Aspen"), propounds the following interrogatories:

1. Please state the correct legal name of the entity that issued Policy ES10274-01 to Michael J. Kulovitz, with a policy period from August 19, 2019 to August 19, 2020.
2. Please state the correct legal name of each agent, servant, employee, or representative of Aspen involved in making the decision to deny a defense and/or indemnity to Michael J. Kulovitz, with regard to the action of Angela Hunter referenced in the Complaint in this matter.
3. Please state the correct legal name of each agent, servant, employee, or representative of Aspen that authored the letter of Ronald Kammer to B. Clark Carpenter, Jr., dated July 9, 2020, in response to a letter from B. Clark Carpenter, Jr. of June 12, 2020 .

4. Please state the correct legal name of each agent, servant, employee, or representative of Aspen that authored the letter of Ronald Kammer to B. Clark Carpenter, Jr., dated November 12, 2019, in response to a letter from B. Clark Carpenter, Jr., of October 17, 2019.
5. Please state the correct legal name of each person who authored all policy forms, endorsements, and other pages comprising Policy ES10274-01, setting out the identity of each person that authored each particular policy form, endorsement, or other pages making up the policy.

Respectfully Submitted,

/s B. Clark Carpenter, Jr.

B. Clark Carpenter, Jr. (CAR007)

Attorney for Plaintiff Michael J. Kulovitz

P.O. Box 277

Talladega, AL 35161

(256) 362-0081

wtcoll@bellsouth.net

DOCUMENT 2

IN THE CIRCUIT COURT OF TALLADEGA COUNTY, ALABAMA

MICHAEL J. KULOVITZ,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO.: CV-
)	
Aspen Specialty Insurance Company,)	
and ABC; ABC being those persons, firms,)	
corporations, or entities issuing to Michael J.))	
Kulovitz that certain professional liability)	
insurance policy made the subject of this)	
case being policy number ES10274-01,)	
whose names are otherwise unknown, but)	
whose name will be added by amendment)	
when ascertained,)	
)	
Defendant.)	

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION TO DEFENDANT ASPEN
SPECIALTY INSURANCE COMPANY**

Plaintiff Michael J. Kulovitz requests that Defendant Aspen Speciality Insurance Company (hereinafter "Aspen") respond to the below requests within 45 days of the date it is served with the Complaint, and that it produce and permit the plaintiff to inspect and copy the following documents:

1. Aspen's entire claim and coverage files generated in connection with the claim of Angela Hunter against Michael Kulovitz in the Circuit Court of Talladega County, Alabama, CV-2019-900480, including, but not limited to, any documents generated prior to suit being filed and including, but not limited to, any documents kept electronically.

2. Any material, whether electronically stored or generated or existing on hard copy, of any nature, form, or description with any connection to the claim of Angela Hunter against Michael Kulovitz in the Circuit Court of Talladega County, Alabama, Civil Action No. 2019-900480, whether generated before or after suit was filed.
3. A complete certified copy of Policy ES10274-01 containing all policy forms, endorsements, and other pages making up the entire policy.
4. A copy of the letter of Ronald Kammer to B. Clark Carpenter, Jr., dated July 9, 2020, in response to a letter from B. Clark Carpenter, Jr., of June 12, 2020.
5. A copy of the letter of Ronald Kammer to B. Clark Carpenter, Jr., dated November 12, 2019, in response to a letter from B. Clark Carpenter, Jr., of October 17, 2019.

Respectfully Submitted,

/s B. Clark Carpenter, Jr.

B. Clark Carpenter, Jr. (CAR007)

Attorney for Plaintiff Michael J. Kulovitz

P.O. Box 277

Talladega, AL 35161

(256) 362-0081

wtcoll@bellsouth.net

IN THE CIRCUIT COURT OF TALLADEGA COUNTY, ALABAMA

MICHAEL J. KULOVITZ,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO.: CV-
)	
Aspen Specialty Insurance Company,)	
and ABC; ABC being those persons, firms,)	
corporations, or entities issuing to Michael J.))	
Kulovitz that certain professional liability)	
insurance policy made the subject of this)	
case being policy number ES10274-01,)	
are otherwise unknown, but whose name)	
will be added by amendment when)	
ascertained,)	
)	
Defendant.)	

**REQUESTS FOR ADMISSION TO DEFENDANT ASPEN SPECIALITY
INSURANCE COMPANY**

COMES NOW Plaintiff Michael J. Kulovitz, and desiring the testimony of Defendant Aspen Specialty Insurance Company (hereinafter "Aspen"), propounds to that defendant the following requests for admissions:

1. Please admit that the original complaint of Angela Hunter referenced in the complaint in this case was filed between August 19, 2019 and August 19, 2020.
2. Please admit that the original complaint of Angela Hunter referenced in the complaint in this case was first received by Michael J. Kulovitz between August 19, 2019 and August 19, 2020.

- DOCUMENT 2
3. Please admit that the original complaint of Angela Hunter against Michael J. Kulovitz was received by Aspen between August 19, 2019 and August 19, 2020.
 4. Please admit that Michael J. Kulovitz, acting personally or through his representative, presented a demand to Aspen to provide a defense and indemnity to him with regard to the original complaint of Angela Hunter against Michael J. Kulovitz between August 19, 2019 and August 19, 2020, as referenced in the complaint in this action.
 5. Please admit that Aspen received a demand from Michael J. Kulovitz, acting personally or through his representative, for Aspen to indemnify and defend him with regard to the original complaint of Angela Hunter against Michael J. Kulovitz between August 19, 2019 and August 19, 2020, as referenced in the complaint in this action.
 6. Please admit that Aspen has denied the demand of Michael J. Kulovitz to provide a defense and indemnity to him regarding the action filed by Angela Hunter against him referenced in the complaint in this matter.
 7. Please admit that the alleged injuries resulting from Michael J. Kulovitz's alleged malicious prosecution of Angela Hunter in Count One of her original and amended complaints against Michael J. Kulovitz were emotional distress, embarrassment, inconvenience, incarceration, loss of time, and financial damages.
 8. Please admit that Policy ES10274-01 contains the following language: "We will pay all amounts up to the limit of liability which you become legally obligated to pay as a result of injury or damage."
 9. Please admit that Policy ES10274-01 contains the following language: "**Injury**" as defined in the General Conditions shall also include the following:
 - A. "Malicious prosecution"

- DOCUMENT 2
10. Please admit that in Alabama, the elements of malicious prosecution are: (1) the institution of judicial proceedings; (2) without probable cause; (3) with malice; (4) disposition favorable to the plaintiff; and (5) injury.
 11. Please admit that Count One of the original and amended complaints of Angela Hunter against Michael J. Kulovitz in this action referenced in the complaint allege that Michael J. Kulovitz instituted a judicial proceeding against Angela Hunter.
 12. Please admit that under the law in Alabama, “absent evidence to the contrary, ‘the words of agreement will be given their ordinary meaning.’” See *Flowers v. Flowers*, 334 So. 2d 856 (Ala. 1976).
 13. Please admit that under the law in Alabama, the phrase “ arising out of” is to be construed very broadly as a general and comprehensive term and is ordinarily understood to mean “originating from,” “having its origin in,” “growing out of,” or “flowing from.”
 14. Please admit that in the original claim of Angela Hunter against Michael J. Kulovitz attached to the complaint herein, there is no claim for any fines, penalties, sanctions, government payments, or the return or withdrawal of fees for patient treatment.
 15. Please admit that in the original and amended complaints of Angela Hunter attached to the complaint in this action, it is alleged that Angela Hunter underwent extensive dental work for which she owed \$1699, and the check was delivered “to be held in some kind of security” for the dental work.
 16. Please admit that the “dental work” referenced in the original and amended complaints of Angela Hunter against Michael J. Kulovitz constituted professional services within the meaning of the policy of insurance issued by Aspen (Policy ES10274-01).
 17. Please admit that the institution of judicial proceedings referenced in the malicious

prosecution in Count One of the complaint of Angela Hunter against Michael J. Kulovitz originated from, had its origin in, grew out of, or flowed from the dental work performed by Michael J. Kulovitz for which Angela Hunter owed, and for which Angela Hunter provided the check made the subject of the arrest warrant as security for payment.

18. Please admit that under Alabama law, insurance policies are to be construed in favor of the insured and strictly against the insurer. See *Safeco Ins. Co. v. Banks*, 152 So. 2d 666 (Ala. 1963).
19. Please admit that under Alabama law, ambiguities in insurance policies are resolved in favor of the insured . See *Safeco Ins. Co. v. Banks*, *supra*.

Respectfully Submitted,

/s B. Clark Carpenter, Jr.

B. Clark Carpenter, Jr. (CAR007)

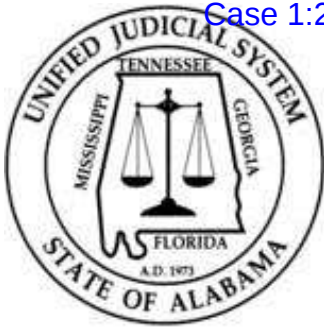
Attorney for Plaintiff Michael J. Kulovitz

P.O. Box 277

Talladega, AL 35161

(256) 362-0081

wtcoll@bellsouth.net



AlaFile E-Notice

61-CV-2021-900021.00

To: B CLARK CARPENTER
WTCOLL@bellsouth.net

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF TALLADEGA COUNTY, ALABAMA

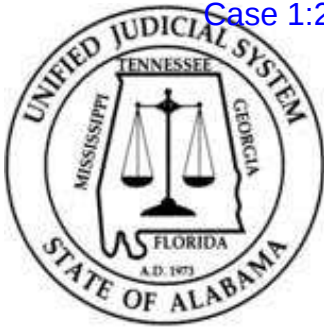
MICHAEL J. KULOVITZ V. ASPEN SPECIALTY INSURANCE MGMT, INC.
61-CV-2021-900021.00

The following complaint was FILED on 1/19/2021 1:55:09 PM

Notice Date: 1/19/2021 1:55:09 PM

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TALLADEGA COUNTY, ALABAMA
P O BOX 6137
TALLADEGA, AL, 35161

256-761-2102
brian.york@alacourt.gov



AlaFile E-Notice

61-CV-2021-900021.00

To: ASPEN SPECIALTY INSURANCE MGMT, INC.
C/O GENERAL COUNSEL
175 CAPITOL BLVD.
ROCKY HILL, CT, 06067

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF TALLADEGA COUNTY, ALABAMA

MICHAEL J. KULOVITZ V. ASPEN SPECIALTY INSURANCE MGMT, INC.
61-CV-2021-900021.00

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State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 61-CV-2021-900021.00
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IN THE CIRCUIT COURT OF TALLADEGA COUNTY, ALABAMA
MICHAEL J. KULOVITZ V. ASPEN SPECIALTY INSURANCE MGMT, INC.

NOTICE TO: ASPEN SPECIALTY INSURANCE MGMT, INC., C/O GENERAL COUNSEL 175 CAPITOL BLVD., ROCKY HILL, CT 06067

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),
 B CLARK CARPENTER

[Name(s) of Attorney(s)]

WHOSE ADDRESS(ES) IS/ARE: 212 NORTH STREET WEST, TALLADEGA, AL 35160

[Address(es) of Plaintiff(s) or Attorney(s)]

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of MICHAEL J. KULOVITZ
 pursuant to the Alabama Rules of the Civil Procedure. *[Name(s)]*

01/19/2021 /s/ BRIAN YORK By: _____
(Date) *(Signature of Clerk)* *(Name)*

☒ Certified Mail is hereby requested. /s/ B CLARK CARPENTER
(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
 _____ in _____ County,
(Name of Person Served) *(Name of County)*

Alabama on _____
(Date)

(Address of Server)

_____ _____
(Type of Process Server) *(Server's Signature)*

_____ _____
(Server's Printed Name) *(Phone Number of Server)*

ELECTRONICALLY FILED

2/1/2021 11:52 AM

61-CV-2021-900021.00

CIRCUIT COURT OF

TALLADEGA COUNTY, ALABAMA

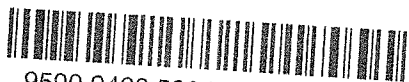
BRIAN YORK, CLERK

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Aspen Specialty Insurance Mgmt Inc.

c/o General Counsel
175 Capitol Blvd.
Rocky Hill, CT 06067



9590 9402 5934 0049 1954 85

2. Article Number (Transfer from service label)

7019 2970 0000 8266 0308

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

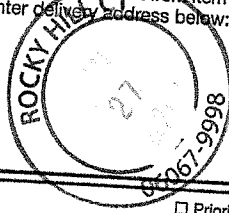
A. Signature

X *Covid-19*☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No



3. Service Type

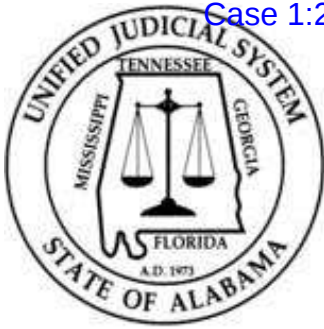
- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Restricted Delivery

Domestic Return Receipt

DOCUMENT 5



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61-CV-2021-900021.00

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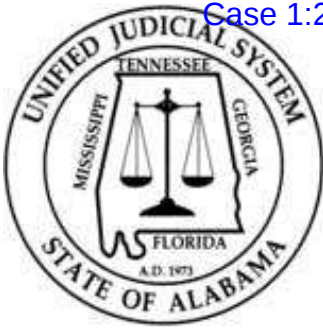
MICHAEL J. KULOVITZ V. ASPEN SPECIALTY INSURANCE MGMT, INC.
61-CV-2021-900021.00

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brian.york@alacourt.gov



AlaFile E-Notice

61-CV-2021-900021.00

To: ASPEN SPECIALTY INSURANCE MGMT, INC. (PRO SE)
C/O GENERAL COUNSEL
175 CAPITOL BLVD.
ROCKY HILL, CT, 06067-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF TALLADEGA COUNTY, ALABAMA

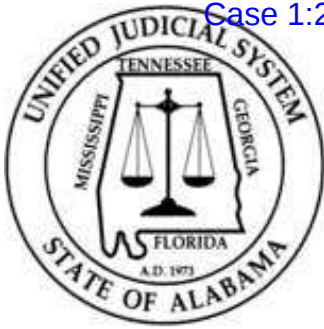
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